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July 27, 2020

**VIA ECF**

Hon. Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2203  
New York, NY 10007

Re: *Conneaut Creek Ship Repair, Inc. v. Versitec Marine Services, Inc. d/b/a Versitec Marine & Industrial*, Case No. 1:20-cv-03435-RA (S.D.N.Y), Motion for Adjournment of Court Deadlines

Dear Judge Abrams:

In light of the fact that the parties have entered into significant settlement discussions, Plaintiff Conneaut Creek Ship Repair, Inc. ("Conneaut Creek"), respectfully requests a sixty (60) day adjournment of all Court deadlines and hearings.

On May 1, 2020, Conneaut Creek filed its initial complaint against Defendant Versitec Marine & Industrial, a Canadian entity, alleging breach of contract, account stated, and unjust enrichment [ECF No. 1]. Conneaut Creek amended its complaint three days later to specify the corporate entity it believed was doing business as Versitec Marine & Industrial [ECF No. 6]. Conneaut Creek served that entity on May 7, 2020 [ECF No. 11].

On May 8, the Court issued its order requiring the parties to provide a case summary, proposed case management plan, and scheduling order by July 31, 2020 and setting a status conference for August 7, 2020 at 12:15 p.m. [ECF No. 10]. On June 2, 2020, the Clerk of Court issued a Clerk's Certificate of Default [ECF No. 15], and on the same day undersigned counsel served Defendant via email and FedEx the Court's May 8, 2020 Order and the Clerk's Certificate of Default.

Subsequent to said service, Conneaut Creek learned that the entity operating as Versitec Marine & Industrial was placed under receivership by the Ontario Superior Court of Justice.

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The parties also began settlement discussions. The parties have made progress to resolve the matter; however, given issues related to COVID-19, the cross-border nature of the negotiations, and the fact that any settlement requires approval by the receiver and perhaps the Ontario Superior Court of Justice, Conneaut Creek respectfully requests that all deadlines and hearings be adjourned for sixty (60) days. The Defendant consents to the relief requested. This is the first request for an adjournment of the Court's deadlines. A proposed order is enclosed.

Application granted. The initial conference scheduled for August 7, 2020 is hereby adjourned to October 16, 2020 at 2:30 p.m. The parties' joint letter and proposed case management plan shall be filed no later than October 9, 2020.

No later than September 30, 2020, the parties shall file a joint letter updating the Court as to the status of their settlement discussions.

SO ORDERED.



Hon. Ronnie Abrams  
7/28/2020

Enclosure

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